

# **EXHIBIT 30**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

WSOU INVESTMENTS LLC \*  
\* June 1, 2021  
VS. \*  
\* CIVIL ACTION NO.W-20-CV-903  
JUNIPER NETWORKS, INC. \*

BEFORE THE HONORABLE ALAN D ALBRIGHT  
MOTION HEARING (via Zoom)

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1 (June 1, 2021, 9:01 a.m.)

2 DEPUTY CLERK: Motion hearing in Civil Action 6-20-CV-903,  
3 styled WSOU Investments LLC versus Juniper Networks,  
4 Incorporated.

5 MS. HARTMAN: Good morning, Your Honor. Sarah Hartman  
6 from Brown Rudnick for the plaintiff WSOU Investments LLC doing  
7 business as Brazos Licensing and Development.

8 Here with me are my colleagues, Timothy Rousseau and  
9 Alessandra Messing, as well as Ray Mort. And from WSOU we have  
10 Matt Hogan and Sheyanna Pietras.

11 THE COURT: I'd like to welcome your client  
12 representatives.

13 And for Juniper?

14 MR. BRIGGS: Good morning, Your Honor. This is Todd  
15 Briggs. With me is Joe Reed and also Russ Horton. And from  
16 Juniper Networks is Dave Saunders who is the director of  
17 litigation.

18 THE COURT: Welcome to Mr. Saunders as well. I appreciate  
19 everyone who is attending who is a client representative.

20 I'm happy to take up the motion to transfer.

21 MR. BRIGGS: Good morning, Your Honor. This is Todd  
22 Briggs for Juniper.

23 So, yes. We're here this morning to address Juniper's  
24 motion to transfer the pending WSOU cases that have been filed  
25 against Juniper to the Northern District of California. And

1 before we get into the transfer factors and the arguments on  
2 the transfer factors, I thought it might be helpful, Your  
3 Honor, to give a little bit of background on the parties  
4 briefly just to provide some context for the overall motion.

5 My client, Juniper Networks, is a networking company.  
6 They make devices such as routers and switches. They're a  
7 company that is based in Sunnyvale, California which is in the  
8 Northern District of California just outside of San Jose.

9 Juniper has been doing business for over two decades and  
10 has been centered in the Northern District of California and in  
11 Sunnyvale and has grown to be a fairly large company.  
12 Presently there are approximately 2,800 -- 2,800 employees in  
13 the Sunnyvale office. Juniper also has some additional offices  
14 throughout the world. Two of the larger ones are in Bangalore,  
15 India. And also there's one in New Jersey.

16 Juniper really hasn't had a real presence in Texas at all  
17 over the past two decades. In 2019 Juniper did acquire a small  
18 company that makes WiFi products that really have nothing to do  
19 with this case. And that company was based in Austin. It's a  
20 company called Mist Systems. And so there was a small office  
21 in Austin, you know, less than I think 40 employees, maybe  
22 around 20 employees. And they did nothing relating to this  
23 case or the accused products in this case. And Juniper's  
24 actually closed that office. So now Juniper has no offices  
25 whatsoever in the Western District of Texas. That happened a

1 couple of months ago.

2 So, you know, if this case were brought today, it would be  
3 very difficult for WSOU to even establish venue over Juniper in  
4 the Western District of Texas. But I say that just so Your  
5 Honor has context as to Juniper's presence in the Western  
6 District of Texas. It's something that just hasn't been there  
7 in the past, and there was a brief period of time where Juniper  
8 had this other company, but now Juniper is largely out of the  
9 Western District of Texas.

10 You know, and that's in sharp contrast to many other tech  
11 companies that you take, Dell, HP, you know, Apple, those kind  
12 of companies. They have very large presences in Austin. But  
13 Juniper's not one of those types of companies. So that's some  
14 background on Juniper.

15 WSOU, I'd like to just briefly give you a little bit of  
16 background of what we've learned about WSOU. So WSOU is a  
17 relatively new company. They purchased a large number of  
18 patents, many of them from Alcatel Lucent. And this occurred  
19 over the past few years. And WSOU was incorporated in Delaware  
20 in May of 2019. So, again, they're a -- I guess two years old  
21 now.

22 A few months after they were incorporated in Delaware,  
23 they were registered to do business -- or they registered to do  
24 business in Texas, and in Waco in particular is where they set  
25 up an office. And this is an office that's -- I think it's

1 very close to Your Honor's courthouse in Waco. It's a couple  
2 blocks away, I've heard. I haven't been there.

3 But there's really not much activity at the office at all.  
4 That's what we've learned through discovery. And you might  
5 remember a few weeks ago we brought an issue to you relating to  
6 the discovery, jurisdictional discovery, and a deposition we  
7 took, a 30(b)(6) deposition of WSOU.

8 And what we learned in that deposition is WSOU only had  
9 four employees at the time this lawsuit was filed back in  
10 September of 2020. The two primary employees are the founder  
11 and chairman, Craig Etchegoyen, and their president, Stuart  
12 Shanus. Both Mr. Etchegoyen and Mr. Shanus live in Los  
13 Angeles, California. They don't live in Waco. They don't work  
14 in Waco. In fact, they've never even been to the Waco office.

15 And these are the two individuals that are, I think,  
16 managing these lawsuits and engaged in the licensing efforts of  
17 the company. And so we learned all of this, you know, during  
18 the deposition a few weeks ago.

19 There is one employee, Mr. Hogan. That's who we deposed.  
20 He recently moved to Waco and he does some business out of that  
21 office, but it's not particularly relevant or related to these  
22 particular patents in this case. And it's not even clear that  
23 he's even really engaged in licensing or anything like that.  
24 He's focused on other endeavors relating to the patents and  
25 their business.

1       So, you know, I give you this as a little bit of  
2 background just to show you the types of connections the two  
3 companies have with, you know, the Western District of Texas  
4 versus California.

5       So with that background, I'd like to get into the actual  
6 factors that we need to examine to determine whether a motion  
7 to transfer's appropriate or not in this case.

8       And Your Honor's very familiar with the eight different  
9 factors. There's four private factors, four public factors.  
10 Based on the briefing, I think at this point only five of the  
11 eight transfer factors are in dispute. So those are the five  
12 that I would like to just briefly focus on.

13       So the first factor is one of the private factors, and  
14 that's the ease of access to sources of proof. And, you know,  
15 under Federal Circuit law, the Genentech case, for example, the  
16 Federal Circuit has made clear that, you know, the bulk of the  
17 relevant evidence in a patent case usually comes from the  
18 accused infringer.

19       And that's very true of this case. In this case, the bulk  
20 of the relevant evidence will come from Juniper. And the  
21 source of that evidence is Sunnyvale, California, where  
22 Juniper's been for over two decades. You'll find technical  
23 documents there. You'll find source code relating to the  
24 accused products there. That's where the vast majority of  
25 Juniper's relevant documentation was created and where it's

1 housed and stored.

2 Juniper has no technical documents or source code in  
3 Texas.

4 And, furthermore, the Juniper employees that were in Texas  
5 generally don't have access to the source code or the technical  
6 documents that are relevant to this infringement action.  
7 They're given to Juniper employees on a need-to-know basis,  
8 kind of a permission-type basis. Just because you're an  
9 employee of the company doesn't mean you have access to all the  
10 documentation. And that's certainly true here, where the  
11 employees in Texas did not have access to the relevant  
12 documentation in this case.

13 And, again, that's because they were acquired primarily  
14 from a smaller company that made completely different products  
15 that are at issue in this case.

16 Now, in sharp contrast to that, WSOU really doesn't have  
17 any documentation in Texas. What we learned during the  
18 deposition of Mr. Hogan is, in their office in Waco, they had  
19 four boxes of documents, like banker's boxes.

20 So we asked when those documents were actually delivered  
21 to the Waco office, and he told us in October of 2020. He told  
22 us he believed that they were delivered there in October of  
23 2020 at the direction of Mr. Shanus, who is the -- again, the  
24 president of WSOU. And so apparently they now have, as of  
25 October 2020, four boxes of documents sitting there.



1 Now, those are not even relevant to the transfer analysis  
2 because these cases were filed before then. So those documents  
3 weren't there before then.

4 And then the only other documentation WSOU has pointed to  
5 is some documents, which are some unspecified documents, in a  
6 file cabinet in the Waco office.

7 So I would submit, Your Honor, that if you put on one side  
8 of the scale on this factor WSOU's documents, these four boxes,  
9 which really shouldn't even be considered, but even if we were  
10 going to consider those, and you put on the other side of the  
11 scale Juniper's documentation in Sunnyvale, there's really no  
12 comparison. So this factor, we would respectfully submit,  
13 strongly favors transfer in this case.

14 The next private-interest factor that's in dispute is the  
15 availability of compulsory process. And I believe -- just to  
16 cut to the chase here, I believe that this factor actually  
17 favors transfer or is, at a minimum, neutral in this situation.  
18 And one of the key points to keep in mind in this particular  
19 case is that -- and I believe this comes from an opinion that  
20 Your Honor wrote earlier this year, and that's basically when  
21 no party has alleged or shown that any witnesses are unwilling  
22 witnesses, a Court should not attach much weight to this  
23 factor.

24 And I think that's the case here. Neither party has  
25 identified any unwilling witnesses at this point. So, you

1 know, given that, it's likely that this factor should be  
2 neutral.

3 What Juniper has identified though are four prior art  
4 witnesses in the Northern District of California that we  
5 believe would be trial witnesses in this case. And those are  
6 witnesses from the companies Futurewei, Newisys, IBM and  
7 LinkedIn.

8 The only thing that Brazos has identified on the other  
9 side are two inventors that are in Texas. They're not within  
10 100 miles of the courthouse, but they're in Texas. And Brazos  
11 has argued that under Rule 45 they could be compelled to  
12 testify at trial, because they're willing to pay their  
13 expenses.

14 And, you know, even if that were the case, they haven't,  
15 you know, claimed that these witnesses are unwilling. And  
16 these are only two inventors on one of the six patents that's  
17 been asserted in this case, or that's currently at issue in  
18 this case. So, you know, if you look at those two witnesses  
19 versus the prior art witnesses in California, they sort of  
20 cancel each other out a little bit, I would submit to you.

21 One point that I would want to note, though, too, is that  
22 the two most relevant witnesses from WSOU, Mr. Etchegoyen, the  
23 founder, and Mr. Shanus, the president. Those two witnesses  
24 are located and reside in California, not Texas. And because  
25 they are both officers of WSOU, they are subject under Rule 45

1 to the subpoena power of the Northern District of California,  
2 because they reside in California. And that's under Rule  
3 45(c). Those two witnesses are not subject to the subpoena  
4 power of Your Honor's Court in Texas.

5 And I would submit to you that, you know, given that if we  
6 were setting aside the issue of unwilling witnesses, that would  
7 definitely tip this factor in favor of Juniper. Because, you  
8 know, it's possible that Mr. Etchegoyen or Mr. Shanus would  
9 decide not to come to trial. Maybe something didn't go well  
10 during their deposition or something like that and they decide  
11 not to come to trial. We could not compel them to come to  
12 trial if we were in the Western District of Texas. And these  
13 are the two most relevant witnesses at WSOU.

14 So in short, on this compulsory process factor, I would  
15 submit, Your Honor, that this factor favors transfer or at a  
16 minimum is neutral.

17 The next private-interest factor that's in dispute is the  
18 cost of attendance for willing witnesses and the convenience of  
19 the witnesses. And I would submit that this factor strongly  
20 favors transfer. And as Your Honor's aware, the Federal  
21 Circuit has stated in cases like Genentech that the convenience  
22 of the witnesses is probably the single most important factor  
23 in the transfer analysis. So this is a very important factor.

24 And in this case we have a substantial number of witnesses  
25 in the Northern District of California. Again, Juniper is

1 centered there, 2,800 employees total. They've been there for  
2 two decades. That's where the key witnesses are -- or a  
3 significant number of the key witnesses are relating to the  
4 accused products, you know, the sales of the accused products,  
5 the marketing of the accused products. All the -- all the  
6 different aspects of a patent infringement case. They're all  
7 in the Northern District of California -- or a substantial  
8 number of them are in the Northern District of California.

9 THE COURT: Could you hold on just for one second?

10 MR. BRIGGS: Yes.

11 THE COURT: Just give me one second.

12 (Pause in proceedings.)

13 THE COURT: Okay. Can you all hear me?

14 You can continue. Thank you.

15 MR. BRIGGS: Okay. Thank you, Your Honor.

16 So again, I was talking about the convenience of the  
17 witness factor and explaining how Juniper's witnesses, the vast  
18 majority of them, are in the Northern District of California.

19 And we've identified in our papers specific witnesses,  
20 sales and marketing witnesses, two specific witnesses, their  
21 licensing, and then various engineers who are in the Northern  
22 District of California who have the relevant knowledge relating  
23 to the accused aspects of the accused products for the various  
24 patents in this case.

25 And again --

1 THE COURT: Are you anticipating that they would testify  
2 at trial?

3 MR. BRIGGS: Absolutely. Absolutely.

4 THE COURT: I haven't had a single person in any of the  
5 patent trials I've had where that's happened.

6 MR. BRIGGS: Oh, that's interesting, Your Honor. The very  
7 last trial I had, we had the actual engineer that -- well, it  
8 was on the other side but the actual engineer that created the  
9 accused functionality testified at trial.

10 THE COURT: Well, we had that in Roku, except that he'd  
11 moved to Arkansas. And he was --

12 MR. BRIGGS: Oh.

13 THE COURT: -- actually closer --

14 MR. BRIGGS: Oh. I mean, that can depend on time  
15 constraints. Because if you're subject to, you know, critical  
16 time constraints, you may only have time to put your expert on;  
17 but sometimes in defense, you want to have the jury see the  
18 individuals who created the accused product and explain how it  
19 works rather than the expert. The testimony can be short, but  
20 it can be powerful.

21 THE COURT: Okay.

22 MR. BRIGGS: So again, Juniper has lots of witnesses that  
23 could potentially testify at trial in the Northern District of  
24 California. They have nobody in the Western District of Texas.

25 Now, WSOU, the best -- as best as we can tell, there's

1 really nobody in Texas from WSOU that would testify at trial.  
2 The only person that's a possibility is Mr. Hogan, and we took  
3 his deposition. And again, he really didn't have any relevant  
4 knowledge about the patents. He doesn't deal in licensing. I  
5 think it's highly, highly unlikely that he would testify at  
6 trial.

7 The two individuals that are much more likely that are  
8 involved in licensing of the patents and the ones that were  
9 involved in purchasing the patents and so on and so forth are  
10 Mr. Etchegoyen and Mr. Shanus who, again, they live in Los  
11 Angeles, California. So they'd still have to travel to the  
12 Northern District, of course, but it's closer.

13 So at the end of the day on this factor, you really -- on  
14 one end of the scale you really have nobody in Texas except  
15 Mr. Hogan. And, again, I don't really see how Mr. Hogan would  
16 be a potential trial witness.

17 And on the other end of the scale you have many different  
18 Juniper employees and potentially Mr. Etchegoyen and  
19 Mr. Shanus. So I would say that this cost of attending --  
20 attendance for willing witnesses strongly favors transfer.

21 Okay. So those are the three private interest factors  
22 that are disputed. And I'd like to move on now to the two  
23 public-interest factors that are disputed.

24 And the first one is the Court congestion factor. And as  
25 Your Honor's very aware, this is the factor that looks at the

1 Court congestion in the Northern District versus the Court  
2 congestion in Your Honor's Court and compares the two.

3 And I think what's helpful here is to look at Your Honor's  
4 recent order from the TikTok case. This order came out on  
5 May 21st, 2021. And in that order Your Honor found that this  
6 factor was neutral. And I think that that is, you know -- I  
7 think Your Honor should follow your analysis in TikTok. That  
8 was also a case that was being transferred from the Western  
9 District of Texas to the Northern District of California. And  
10 it is -- I guess that's less than two weeks ago. So, you know,  
11 based on that, I think that in this case the same exact  
12 analysis would apply. I don't know why it wouldn't apply.

13 I also think that, you know, the Federal Circuit gave some  
14 guidance on this factor late last year in the in re Apple case  
15 where they reached a similar conclusion. They found that  
16 looking at, you know, the congestion in the Northern District  
17 and the Western District of Texas, that this was a neutral  
18 factor.

19 And it's also important to remember that this is a -- and  
20 the Federal Circuit has said this, I think in the Apple case,  
21 that this is one of those factors that's definitely on the  
22 speculative side because many things can happen between now,  
23 the early stages of a case, and trial. And I know Your Honor  
24 does your very best job to keep the trial date, but sometimes  
25 that's difficult. And so this is -- this is a factor that

1 tends to be on the very speculative side.

2 But at the end of the day, I think, you know, given Your  
3 Honor's recent opinion in TikTok, this is a neutral factor.

4 And then, finally, the last of the disputed factors is the  
5 local interest factor. And what this factor analyzes is the  
6 local interest in the two different venues we're comparing. So  
7 we have to look at the local interest in Texas and compare  
8 those to the local interest in the Northern District of  
9 California. And I would submit, Your Honor, that when you do  
10 that, this factor also strongly favors transfer.

11 The key on this factor is you have to look at the  
12 connections between a venue and the events that give rise to  
13 the suit. That's the key language, the events that give rise  
14 to the suit. And that comes out of Federal Circuit cases such  
15 as Hoffman-La Roche.

16 And so if you take a step back and you look at what events  
17 gave rise to this suit, it's really the creation of the accused  
18 products and the sale of the accused products. And that  
19 primarily happens out of Sunnyvale, California. It does not  
20 happen at all in Texas.

21 There are, of course, Juniper products sold in the Western  
22 District of Texas. But there's also Juniper products sold in  
23 every district in the United States. So that doesn't really  
24 have a significant impact on this. And I think there's also  
25 Federal Circuit case law on that.



1 And, you know, the fact that WSOU chose to create an  
2 office in Waco, Texas, that just does not submit -- or that  
3 does not create a local interest. The local interest is really  
4 created by the alleged infringer and where they created the  
5 accused products.

6 And I think that's especially true when the plaintiff sets  
7 up an office and it's done simply to try and establish some  
8 type of presence, you know, prior to filing suits against  
9 multiple companies. And I think the Federal Circuit recognized  
10 this sort of issue in the in re Zimmer Holdings case at 609  
11 F.3d 1378, when the Federal Circuit found that transfer was  
12 warranted where the plaintiff's presence in Texas appeared to  
13 be recent, ephemeral and an artifact of litigation.

14 And I think that -- I think if you look at the facts in  
15 this case, especially after we took Mr. Hogan's deposition that  
16 we submitted a lot of that testimony to Your Honor with our  
17 papers, I think you'll see that this is a situation just like  
18 that.

19 So in sum, of the five disputed transfer factors, I think  
20 the relative ease of access of sources of proof strongly favors  
21 transfer. The availability of compulsory process favors  
22 transfer or is neutral at a minimum. The cost of attending --  
23 attendance for willing witnesses strongly favors transfer. The  
24 Court congestion factor is neutral. And the local interest  
25 factor -- or the local interest factor strongly favors

1 transfer.

2 And so that is all I wanted to cover, Your Honor. If you  
3 have any questions, I'd be happy to answer them. But, you  
4 know, given that analysis, I believe this case is a very clear  
5 candidate for transfer.

6 THE COURT: Now I'll hear a response from WSOU.

7 MS. HARTMAN: Thank you, Your Honor.

8 Your Honor, Juniper has not met its burden to show that  
9 transfer is clearly more convenient. I'm first going to  
10 discuss Brazos' ties and then Juniper's, and I'll correct the  
11 record or respond to what counsel said along the way.

12 Brazos is a Waco-based company, and it does have strong  
13 local ties. And it has those ties since before these cases  
14 were filed.

15 It has witnesses in Waco, including Mr. Hogan, who will be  
16 called as a witness as to Brazos' business operations, and  
17 Brazos does have sources of proof in Waco and managed from  
18 Waco.

19 Mr. Hogan did testify that documents relating to Brazos'  
20 business are stored in a filing cabinet in Waco, which is  
21 different than what counsel was referring to.

22 You know, given that Brazos is a Waco-based company with  
23 witnesses in Waco, this case is very different from the Federal  
24 Circuit decisions that are so heavily relied on by Juniper,  
25 including in re Apple and in re Adobe and in re Tracfone.

1        Brazos chose Waco for its headquarters because Waco was a  
2        burgeoning tech center with Baylor University as the anchor.  
3        Brazos' founders wanted to intrench themselves in a place where  
4        there was technology being developed that could potentially be  
5        patented. Brazos is operating its business there and has been  
6        since before these cases were filed.

7        Simply because COVID-19 threw a wrench in travel over the  
8        past year and a half to anywhere, including to Waco, does not  
9        make that otherwise.

10       In addition to showing that it has witnesses and sources  
11       of proof in Waco, Brazos has also identified at least two  
12       inventors who live in Texas and would be subject to the Court's  
13       compulsory process, as they would not incur substantial expense  
14       to come testify.

15       Brazos has also identified other third-party inventors and  
16       prosecuting attorneys who are located across the globe but  
17       closer to Waco.

18       In addition, according to the most recent U.S. Federal  
19       Court statistics, not relying solely on the Court's schedule,  
20       the time to trial in this district is faster than in Northern  
21       California. Juniper has not shown that any of the transfer  
22       factors favor transfer, much less that it's clearly more  
23       convenient.

24       Juniper actually concedes that its sources of proof are  
25       stored on servers located across the globe. This does not

1 favor transfer.

2 Juniper also does not show that any witnesses are  
3 unwilling to testify, much less that any unwilling witnesses  
4 are subject to the -- only the compulsory process of Northern  
5 California.

6 It is Juniper's burden to show unwillingness. Juniper's  
7 prior art witnesses are unpersuasive for several reasons,  
8 including because Juniper does not show that any are unwilling.  
9 Three or four of them are also subject to compulsory process in  
10 this Court.

11 Juniper does not identify -- or I'm sorry. As to the  
12 recent argument that counsel just made as to Mr. Shanus and  
13 Mr. Etchegoyen, those are party witnesses not located in  
14 Northern California and not considered under the unwilling  
15 witness factor.

16 As to convenience of willing witnesses, Juniper does not  
17 identify any third-party willing witnesses, and it identifies  
18 employees with relevant knowledge but who are located across  
19 the globe.

20 And finally, as to the local interest factor, to respond  
21 to what counsel said, contrary to what counsel said, Juniper  
22 actually has multiple offices in Texas. I believe in Plano,  
23 Houston, and its witness testified that it does still pay the  
24 lease for the Austin office, and it definitely did and  
25 maintained that office at the time this action was filed, which

1 is not in dispute.

2 Juniper also admits that it has at least 40 employees,  
3 numerous resellers and distributors and a significant amount of  
4 sales of accused products in this district and did so at the  
5 time these actions were filed.

6 It also admits that at least some of the accused products  
7 and functionality were designed and developed outside of  
8 California.

9 In sum, Your Honor, many of the factors weigh against  
10 transfer and none favor it. Juniper has not satisfied its  
11 burden to show that transfer is clearly more convenient. So  
12 Brazos respectfully requests that Your Honor deny Juniper's  
13 motion to transfer.

14 Thank you.

15 THE COURT: Any rebuttal to that?

16 MR. BRIGGS: Your Honor, very brief -- this is Todd  
17 Briggs, again -- very briefly.

18 Much of what counsel just argued, much of the facts and  
19 the arguments that were made have been found time and again to  
20 be irrelevant to the transfer analysis.

21 For example, the fact that Juniper's documents can be  
22 accessed, you know, from different locations around the globe,  
23 you know, the Federal Circuit has looked at that issue and  
24 said, well, that might be true, but you still need to look at  
25 where the primary source of the documents are for that factor.

1 And that's undeniably in Sunnyvale, California.

2 And counsel, again, is attempting to argue that Brazos has  
3 a very strong connection to Texas. And I think Ms. Hartman  
4 actually said that they have witnesses, plural, you know,  
5 potential witnesses, plural. I'm not aware of the -- anybody,  
6 other than Mr. Hogan; and again, Mr. Hogan is not involved  
7 in -- I think Ms. Hartman said he would testify about business  
8 operations. I'm not sure what that is.

9 The real heart and soul of WSOU with respect to this case  
10 and any relevant testimony comes from Mr. Etchegoyen and  
11 Mr. Shanus. And they are in California, they're not in Texas.  
12 Again, they've never even set foot in the office in Waco since  
13 it opened. And that's not because of COVID, as counsel  
14 suggested. They've been traveling. Mr. Etchegoyen travels  
15 back and forth to Hawaii all the time. He could easily fly to  
16 Texas.

17 So, you know, their business is not really conducted out  
18 of that office. It's done by Mr. Etchegoyen and Mr. Shanus in  
19 Los Angeles. And by the way, WSOU also has an office in Los  
20 Angeles, in Santa Monica, California. So it's not like their  
21 only office in the United States is in Waco, Texas.

22 So, again, I'm very mindful of your time, Your Honor, and  
23 I think we've addressed all the points today in my initial  
24 argument and in our papers. And if there are any specific  
25 issues you would like me to address, I'd be happy to do so.

1 THE COURT: I'm good.

2 Anything else, Ms. Hartman?

3 MS. HARTMAN: Thank you, Your Honor.

4 Just to clarify, I did not actually discuss the access of  
5 Juniper's documents. I discussed that Juniper admitted that  
6 its documents were stored on servers that are located across  
7 the globe.

8 And I will also note that the fact that Brazos subleases a  
9 small office space for Mr. Shanus to go to occasionally does  
10 not -- outside of both districts, does not change Brazos'  
11 connections to Waco. And I will say that Mr. Etchegoyen and  
12 Mr. Shanus have been to the office. It's just that during the  
13 last year and a half, during COVID, travel was difficult during  
14 COVID.

15 So hopefully I addressed all of those points, and thank  
16 you, Your Honor.

17 THE COURT: Okay. Well, we're working on this and we'll  
18 get something out hopefully in the very near future.

19 Thank you, everyone, for your arguments this morning.

20 (Off-the-record discussion.)

21 THE COURT: Those of you who are here for this motion to  
22 transfer hearing, thank you. You all can drop off and we'll  
23 take up the Markman now.

24 (Hearing adjourned at 9:40 a.m.)

25

1 UNITED STATES DISTRICT COURT )  
2 WESTERN DISTRICT OF TEXAS )  
3

4 I, Kristie M. Davis, Official Court Reporter for the  
5 United States District Court, Western District of Texas, do  
6 certify that the foregoing is a correct transcript from the  
7 record of proceedings in the above-entitled matter.

8 I certify that the transcript fees and format comply with  
9 those prescribed by the Court and Judicial Conference of the  
10 United States.

11 Certified to by me this 6th day of June 2021.

12  
13 /s/ Kristie M. Davis  
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